

# **Exhibit A**

**(Excerpt From August 8, 2022 Deposition of Brenda Murphy)**

Brenda C. Murphy  
The South Carolina State Confvs.McMaster/Alexander

August 8, 2022

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

THE SOUTH CAROLINA STATE  
CONFERENCE OF THE NAACP

and

TAIWAN SCOTT, ON BEHALF OF HIMSELF  
AND ALL OTHER SIMILARLY SITUATED  
PERSONS,

Plaintiffs,

vs.

Case No. 3:21-CV-03302-MGL-TJH-RMG

THOMAS C. ALEXANDER, IN HIS OFFICIAL  
CAPACITY AS PRESIDENT OF THE SENATE;  
LUKE A. RANKIN, IN HIS OFFICIAL CAPACITY  
AS CHAIRMAN OF THE SENATE JUDICIARY  
COMMITTEE; MURRELL SMITH, IN HIS OFFICIAL  
CAPACITY AS SPEAKER OF THE HOUSE OF  
REPRESENTATIVES; CHRIS MURPHY, IN HIS  
OFFICIAL CAPACITY AS CHAIRMAN OF THE HOUSE  
OF REPRESENTATIVES JUDICIARY COMMITTEE;  
WALLACE H. JORDAN, IN HIS OFFICIAL CAPACITY  
AS CHAIRMAN OF THE HOUSE OF REPRESENTATIVES  
ELECTIONS LAW SUBCOMMITTEE; HOWARD KNAPP,  
IN HIS OFFICIAL CAPACITY AS INTERIM  
EXECUTIVE DIRECTOR OF THE SOUTH CAROLINA  
STATE ELECTION COMMISSION; JOHN WELLS,  
JOANNE DAY, CLIFFORD J. EDLER, LINDA MCCALL,  
AND SCOTT MOSELEY, IN THEIR OFFICIAL  
CAPACITIES AS MEMBERS OF THE SOUTH CAROLINA  
STATE ELECTION COMMISSION,

Defendants.

DEPOSITION OF: BRENDA C. MURPHY  
(Via Videoconference)

DATE: Monday, August 8, 2022

TIME: 10:00 a.m.

LOCATION: 6111 North Main Street  
Columbia, South Carolina

1       there is splitting -- to minimize splitting.  
2       Minimize packing in hopes of Black people being able  
3       to have some influence over who is elected as their  
4       representative.

5               Q.     All right. So let's go through some of  
6       those. You said it was important that they were  
7       contiguous. Right?

8               A.     Yes.

9               Q.     That doesn't have anything to do with  
10      race. Correct?

11              A.     Well, I think the main thing is that  
12      they are drawn in such a way that the Black vote has  
13      some influence over who serves, the individual.  
14      That's the primary goal.

15              Q.     Yes, ma'am. But contiguous means that a  
16      district would be next to each other. Right?

17              A.     Yeah. Yeah.

18              Q.     So that wouldn't have anything to do  
19      with race. Correct?

20              A.     Well, it might.

21              Q.     The communities of interest, are there  
22      communities of interest that don't involve race?

23              A.     Well, yeah. If you look at subsets,  
24      yes, community subsets within a community. But when  
25      we are talking communities of interest, we are